

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
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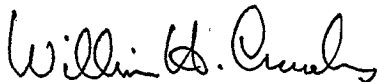
6 December 1995

Lester A. Snow, Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814**COMMENTS ON THE DECEMBER 4TH CALFED WORKSHOP**

The following are comments on the CALFED proposed action categories as they were grouped into an initial boundary condition for the 4 December 1995 workshop. During the workshop and breakout session, it was described that the "Preliminary Boundary Alternative" would be a starting point for development of the recommended alternative. The basis for this initial boundary alternative was that water quality issues would be solved by dilution through increased flow rather than discharge control. Such an approach is contrary to the philosophy behind the Federal Clean Water Act and the Porter-Cologne Water Quality Control Act. Under these regulatory acts, beneficial uses are to be protected by control of waste discharges regardless of in stream flow rates.

Control of wastewater sources is critical to the long-term health of the Delta. CALFED should recommend that the principal point sources of discharge continue to be regulated as has been done in the past but that a greater effort should be undertaken for nonpoint sources including abandoned mines, agricultural drainage, dredge materials and surface agricultural and urban runoff that in many instances may include toxic pesticides. Each of these nonpoint sources was listed separately in a previous workshop as a category for action. As discussed in the previous workshop, actions to control discharges should continue to be a principal step in any long-term Bay-Delta solution.

In crafting a solution for the problems of the Delta, we recommend that CALFED consider using source control as a principal means of improving water quality. If you have any questions, please call me at (916) 255-3039 or if your staff have any questions, please call Dennis Westcot at (916) 255-3087.


WILLIAM H. CROOKS
Executive Officercc: Regional Board Members
Walt Pettit, Executive Director, State Water Resources Control Board, Sacramento